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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF SWAPNA C. REDDY
IN SUPPORT OF SUPPLEMENT TO
MOTION FOR COMPLIANCE [ECF 286]**

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**DECLARATION OF SWAPNA C. REDDY, CO-EXECUTIVE DIRECTOR OF THE
ASYLUM SEEKER ADVOCACY PROJECT ("ASAP")**

I, Swapna C. Reddy, submit this declaration pursuant to 28 U.S.C. § 1746 and declare under penalty of perjury as follows:

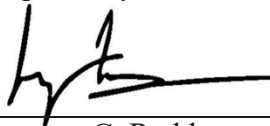
1. I am the Co-Executive Director of the Asylum Seeker Advocacy Project ("ASAP"). I have served in this role since 2019.
2. As Co-Executive Director I oversee much of ASAP's programming, including supervising its membership services, technology, and legal resource teams.
3. I make this sworn statement based upon personal knowledge, files and documents I have reviewed, as well as information supplied to me by employees of ASAP whom I believe to be reliable. This information is of a type that is generated in the ordinary course of our business and that I would customarily rely upon in conducting ASAP business.
4. ASAP is a national voluntary membership organization of asylum seekers incorporated as a 501(c)(3) nonprofit organization in New York. ASAP provides our members with legal and community support.
5. ASAP has over 700,000 members, who come from over 175 countries, including Venezuela. Our members reside in all 50 states and several U.S. territories.
6. ASAP members are in various stages of their immigration proceedings. Many ASAP members have asylum cases pending at the U.S. Citizenship and Immigration Services (USCIS) or with the immigration courts, and/or Temporary Protected Status (TPS).
7. On September 8, 2025, ASAP staff attorneys were able to select Venezuela as an option from the drop down of countries that individuals must select from in order to complete Form I-821 Application for Temporary Protected Status online.
8. On or about 8:55am ET on September 10, 2025, an ASAP staff attorney noticed that USCIS had removed Venezuela from the drop down of countries that individuals must select from in order to complete Form I-821 online. I am attaching a screenshot of the dropdown taken at that time as Attachment A.
9. On or about 9:00am ET on September 10, 2025, an ASAP staff attorney noticed that the USCIS system was now displaying an error message on saved drafts of the online Form I-821 if Venezuela had been selected prior to USCIS removing the option. I am attaching a screenshot of the error message taken at that time as Attachment B.
10. As of 2:05 pm ET on September 10, 2025, both of these issues persist. I am attaching a screenshot of the dropdown issue taken at 2:05 pm ET as Attachment C. I am also attaching a screenshot of the error message issue taken at 2:05 pm ET as Attachment D.

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- 2 11. As of 2:06 pm ET, it is not possible to submit Form I-821 online without selecting a
- 3 country from the dropdown list. I am attaching a screenshot from 2:06 pm ET as
- 4 Attachment E showing the error message that occurs if individuals attempt to leave the
- 5 country field blank.
- 6
- 7 12. As a result of these issues, it is not possible for TPS holders from Venezuela to re-register
- 8 online at this time.
- 9
- 10 13. USCIS currently requires applications submitted by mail to be *received* by the deadline,
- 11 rather than *postmarked* by the deadline. As a result, we are concerned that individuals may
- 12 face issues if they try to shift from re-registering online to re-registering by mail in
- 13 response to the online filing issues.

14 I hereby declare under penalty of perjury that the foregoing is true and correct.

15 Dated: September 10, 2025

16 Respectfully submitted,

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19 Swapna C. Reddy

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